

FILE COPY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**JUDGE BUCHWALD**

COMPANIA DEL BAJO CARONI (CAROMIN), C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera  
Quinta Analú, Puerto Ordaz, Estado Bolivar Venezuela,  
and

**07 CV 3179**  
Civil Action No. \_\_\_\_\_

V.M.C. MINING COMPANY, C.A.,  
Calle Cuenca, Manzana 7, Campo B de Ferrominera  
Quinta Analú, Puerto Ordaz, Estado Bolivar Venezuela,

Plaintiffs,

STATEMENT PURSUANT  
TO RULE 7.1 OF THE  
FEDERAL RULES OF  
CIVIL PROCEDURE

- against -

BOLIVARIAN REPUBLIC OF VENEZUELA,  
c/o Consulate General of Venezuela  
7 East 51<sup>st</sup> Street  
New York, New York 10022, and

MINISTRY OF BASIC INDUSTRIES AND MINES  
c/o Consulate General of Venezuela  
7 East 51<sup>st</sup> Street  
New York, New York 10022,

Defendants.



Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, and to enable judges and magistrates of the court to evaluate possible disqualification or recusal, the undersigned attorneys of record for Plaintiffs Compañia Del Bajo Caroni (Caromin), C.A. and V.M.C. Mining

Company, C.A., certify that they have no parent corporations, and no publicly held corporation owns ten (10%) percent or more of their stock.

Dated: New York, New York  
April 20, 2007

GREENBERG TRAURIG, LLP

By: James W. Perkins  
James W. Perkins (JWP 6684)  
MetLife Building, 200 Park Avenue  
New York, New York 10166  
(212) 801-9200

Ronald W. Kleinman  
Steven M. Schneebaum  
800 Connecticut Avenue, N.W.  
Washington, D.C. 20006  
(202) 331-3100

*Attorneys for Plaintiffs*  
*Compañia del Bajo Caroni (CAROMIN), C.A.*  
*and V.M.C. Mining Company, C.A.*

Of Counsel:

Erwin Gonzales  
Colson Hicks Eidson  
255 Aragon Avenue  
Coral Gables, Florida 33134  
(305) 476-7400